



370 Lexington Avenue, Suite 1208  
New York, NY 10017

Tel (646) 560-3224

Fax (207) 421-9215

Yann Geron

[ygeron@geronlegaladvisors.com](mailto:ygeron@geronlegaladvisors.com)

[geronlegaladvisors.com](http://geronlegaladvisors.com)

March 20, 2025

**VIA EMAIL AND ELECTRONIC FILING** ([MG.CHAMBERS@NYSB.USCOURTS.GOV](mailto:MG.CHAMBERS@NYSB.USCOURTS.GOV))

The Honorable Martin Glenn  
Chief United States Bankruptcy Judge  
United States Bankruptcy Court  
One Bowling Green  
New York, NY 10004-1408

**Re: Madhu Grover, Debtor; Case No. 22-11730-mg; Trustee v. Grover; Adv. Pro. No. 23-01198-mg; Busche v. Grover; Adv. Pro. No. 23-01199-mg; Pandarinathan v. Grover; Adv. Pro. No. 23-01200-mg**

Your Honor:

I am the chapter 7 trustee of the bankruptcy estate of Madhu Grover (the “Debtor”), the above-referenced debtor. This letter is being jointly submitted on behalf of each of the parties in the above-referenced adversary proceedings (the “Adversary Proceedings”). These matters were previously adjourned *sine die* in order to allow: (i) completion of additional discovery in the Pandarinathan adversary proceeding, and (ii) the Court to issue its opinion on the Plaintiff’s motion seeking a declaratory judgment that a judgment entered against Debtor/Defendant in a New York State court action has a preclusive effect in the Busche adversary proceeding. Each of these matters has since been resolved.

The parties have conferred among themselves and propose the following schedule with respect to the joint pre-trial order (the “PTO”) in the Adversary Proceedings:

- Plaintiffs’ counsel to provide their joint draft of the PTO to Debtor/Defendant’s counsel by March 24, 2025;
- Debtor/Defendant’s counsel to provide comments to the draft PTO to Plaintiff’s counsel by April 23, 2025;
- Parties have a meet and confer to discuss comments to the PTO by May 7, 2025;
- Parties to submit the joint PTO to Chambers by May 21, 2025; and
- A final pre-trial conference to be held at a date to be scheduled by the Court after May 21, 2025.

The parties are available to discuss the proposed PTO timeline should Your Honor have any questions or comments.

Respectfully submitted,

*/s/ Yann Geron*

Yann Geron

cc (via email):

Diane Bradshaw, Esq.  
Nicole N. Santucci, Esq.  
Mark Silver, Esq.  
Adrienne Woods, Esq.